

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE PFIZER INC SHAREHOLDER
DERIVATIVE LITIGATION : Master File No. 1:09-cv-7822
: (JSR)
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**DECLARATION OF JAMES P. ROUHANDEH IN SUPPORT OF THE
INDIVIDUAL DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

James P. Rouhandeh, an attorney admitted to practice before this Court and a partner in the law firm of Davis Polk & Wardwell LLP, counsel for the non-director individual defendants, submits this Declaration in support of defendants' motion for summary judgment ("Defs.' Mot."), and pursuant to 28 U.S.C. § 1746 hereby declares:

1. Attached hereto as Exhibit 1 is a true and correct copy of excerpts from Pfizer Inc's 2010 Proxy Statement issued on March 13, 2010.

2. Attached hereto as Exhibit 2 is a true and correct copy of a professional biography of Jeffrey B. Kindler retrieved from Pfizer Inc's company website on October 21, 2010.

3. Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the August 6, 2010 deposition of Joseph M. Feczko.

4. Attached hereto as Exhibit 4 is a true and correct copy of a sample Matters Tracking Chart provided by Douglas Lankler to the Audit Committee dated February 8, 2008, and bearing bates numbers PFE DERIV 00003463-66.

5. Attached hereto as Exhibit 5 is a true and correct copy of a professional biography of Douglas M. Lankler retrieved from Pfizer Inc's

company website on October 21, 2010.

6. Attached hereto as Exhibit 6 is a true and correct copy of a professional biography of Ian C. Read retrieved from Pfizer Inc's company website on October 21, 2010.

7. Attached hereto as Exhibit 7 is a true and correct copy of a Presentation to the Compensation Committee of Pfizer Inc's Board of Directors titled DOJ Bextra Investigation and bearing bates numbers PFE DERIV A 00011848-61.

8. Attached hereto as Exhibit 8 is a true and correct copy of an Rx Compliance Report article titled "Federal prosecutors report slowdown in the filing of new fraud claims, say less egregious violations cited," dated July 21, 2010.

9. Attached hereto as Exhibit 9 is a true and correct copy of a Pfizer Inc press release titled, "FTC Grants Final Clearance for Pfizer/Warner-Lambert Merger, Transaction Completed Today," dated June 19, 2000.

10. Attached hereto as Exhibit 10 is a true and correct copy of the Settlement Agreement and Release between the United States of America and Pfizer Inc, et al. in United States of America v. Warner-Lambert Company, Criminal No. 04-10150 RGS (District of Massachusetts), dated May 11, 2004, with attachments.

11. Attached hereto as Exhibit 11 is a true and correct copy of the Information filed in United States of America v. Warner-Lambert Company, Criminal No. 04-10150 RGS (District of Massachusetts), on May 13, 2004.

12. Attached hereto as Exhibit 12 is a true and correct copy of the Sentencing Memorandum of the United States, filed in United States of America v. Warner-Lambert Company, Criminal No. 04-10150 RGS (District of Massachusetts), on June 2, 2004.

13. Attached hereto as Exhibit 13 is a true and correct copy of the Warner-Lambert Company Form 10-Q, filed on May 10, 2000.

14. Attached hereto as Exhibit 14 is a true and correct copy of the minutes of the June 22, 2000 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000614-31.

15. Attached hereto as Exhibit 15 is a true and correct copy of the memorandum from Karen Katen to Joe Feczko, Pat Kelly and Hank McCrorie dated November 10, 2000.

16. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from the August 13, 2010 deposition of Henry A. McKinnell.

17. Attached hereto as Exhibit 17 is a true and correct copy of the memorandum from Amy Schulman and Douglas Lankler to the Pfizer Inc Board of Directors, dated May 31, 2009, and bearing bates numbers PFE DERIV 00077299-313.

18. Attached hereto as Exhibit 18 is a true and correct copy of excerpts from the September 21, 2010 deposition of Jeffrey B. Kindler.

19. Attached hereto as Exhibit 19 is a true and correct copy of excerpts from the August 31, 2010 deposition of William C. Steere, Jr.

20. Attached hereto as Exhibit 20 is a true and correct copy of the Settlement Agreement between the United States of America and Pfizer Inc, et al. in United States ex. rel John David Foster v. Warner-Lambert, Parke-Davis, and Pfizer Inc, No. 1:00-cv-00246 (E.D. Texas), effective on October 15, 2002.

21. Attached hereto as Exhibit 21 is a true and correct copy of the Corporate Integrity Agreement between the Office of Inspector General of the Department of Health and Human Services and Pfizer Inc, dated October 24, 2002.

22. Attached hereto as Exhibit 22 is a true and correct copy of the Government's Sentencing Memorandum filed in United States v. Pharmacia & Upjohn Co., Inc., Cr. No. 07-10099-RGS (D. Mass April 23, 2007).

23. Attached hereto as Exhibit 23 is a true and correct copy of a December 12, 2005 Compliance Update and accompanying memorandum from Douglas Lankler to the Audit Committee, bearing bates numbers PFE DERIV A 00003428-30.

24. Attached hereto as Exhibit 24 is a true and correct copy of an Agreement and accompanying exhibits between the United States Attorney's Office for the District of Massachusetts, the United States Department of Justice and Pharmacia & Upjohn Company, Inc. dated August 31, 2009.

25. Attached hereto as Exhibit 25 is a true and correct copy of an e-mail from Karen Katen to the Bextra Sales Force dated April 5, 2002, with the subject Pfizer/Pharmacia Guidelines bearing bates numbers PFE DERIV 00071893-94.

26. Attached hereto as Exhibit 26 is a true and correct copy of excerpts

from a transcript of a presentation by Carrie Cox and Karen Katen at the Bextra launch meeting on April 11, 2005 bearing bates numbers PFE DERIV 0007344-46.

27. Attached hereto as Exhibit 27 is a true and correct copy of an Agreement and accompanying exhibits between the United States Attorney's Office for the District of Massachusetts and Pharmacia regarding the marketing of Genotropin, dated March 27, 2007, bearing bates numbers EOUSA 1423-60.

28. Attached hereto as Exhibit 28 is a true and correct copy of a DOJ press release dated April 2, 2007, which is also available at <http://www.justice.gov/usao/ma/Press%20Office%20-%20Press%20Release%20Files/Apr2007/Pharmacia-Information-Settlement.html>.

29. Attached hereto as Exhibit 29 is a true and correct copy of excerpts of Pfizer Inc Review and Voluntary Disclosure Relating to Bextra Allegations, dated November 16-17, 2004, bearing bates numbers BEX000000059-238.

30. Attached hereto as Exhibit 30 is a true and correct copy of prepared slides and remarks from a presentation titled "Portfolio Advantage: Leading the World of Pain and Inflammation," delivered at a Pfizer Inc March 2003 Product Manager Product Physician Meeting, and bearing bates numbers BEX005153251-96.

31. Attached hereto as Exhibit 31 is a true and correct copy of the April 22, 2004 "Chairman's Briefing Book" from the Pfizer Inc Annual Meeting of Shareholders, and bearing bates numbers BEX004352699-740.

32. Attached hereto as Exhibit 32 is a true and correct copy of a March 15, 2004 memorandum from Jeffrey B. Kindler to Pfizer Inc's Board of Directors, bearing bates numbers PFE DERIV A 00007151-61.

33. Attached hereto as Exhibit 33 is a true and correct copy of excerpts from the August 17, 2010 deposition of Douglas M. Lankler.

34. Attached hereto as Exhibit 34 is a true and correct copy of the January 16, 2004 Minutes of a Special Meeting of the Board of Directors of Pfizer Inc, bearing bates numbers PFE DERIV A 00000368-78.

35. Attached hereto as Exhibit 35 is a true and correct copy of the March 21, 2003 complaint filed in United States v. Pfizer Inc, No. 03-60494 (S.D. Fla.).

36. Attached hereto as Exhibit 36 is a true and correct copy of an e-mail from Lenard Everett to the U.S. Geodon Sales Force dated October 17, 2007, with the subject Child Psychiatrist and Geodon Promotion, bearing bates numbers PG 267427-28.

37. Attached hereto as Exhibit 37 is a true and correct copy of a letter from Michael J. Sullivan to Robert B. Fiske, Jr. and James P. Rouhandeh, dated May 13, 2004.

38. Attached hereto as Exhibit 38 is a true and correct copy of the Corporate Integrity Agreement Between the Office of Inspector General of the Department of Health and Human Services and Pfizer Inc, dated May 11, 2004.

39. Attached hereto as Exhibit 39 is a true and correct copy of a presentation entitled "Pfizer Publications Policies and Procedures: Town Halls" dated March 2 and 7, 2006.

40. Attached hereto as Exhibit 40 is a true and correct copy of a letter to Nicole Hall from John Rah, dated December 27, 2006, and bearing bates numbers PFE DERIV 00068016-18.

41. Attached hereto as Exhibit 41 is a true and correct copy of an e-mail from Francine Bonica attaching a memorandum from Rick Burch to all sales representatives involved in the promotion of Bextra, dated August 23, 2004 and bearing bates numbers BEX006332922-23.

42. Attached hereto as Exhibit 42 is a true and correct copy of a e-mail from Amy S. Jenner to Jacqueline C. Wolff dated September 26, 2004, bearing bates number BEX000002661.

43. Attached hereto as Exhibit 43 is a true and correct copy of a memorandum from Mick Mosebrook to the Pfizer U.S. Sales Force, dated May 3, 2004 and bearing bates numbers BEX000002657-58.

44. Attached hereto as Exhibit 44 is a true and correct copy of a memorandum from Mick Mosebrook to the Pfizer U.S. Field Force, dated October 1, 2004 and bearing bates numbers PFE DERIV 00072060-61.

45. Attached hereto as Exhibit 45 is a true and correct copy of excerpts from the August 20, 2010 deposition of William R. Howell.

46. Attached hereto as Exhibit 46 is a true and correct copy of an e-mail from Eric Aaronson to the Pfizer legal product support team, dated May 19,

2005, with the subject “FW: Mentorships,” bearing bates numbers PFE DERIV 00072149-50.

47. Attached hereto as Exhibit 47 is a true and correct copy of an article published by PhRMA entitled “Pharmaceutical Marketing in Perspective.”

48. Attached hereto as Exhibit 48 is a true and correct copy of an October 28, 2004 presentation to the Audit Committee regarding U.S. Speaker Programs bearing bates numbers PFE DERIV 00071123-48.

49. Attached hereto as Exhibit 49 is a true and correct copy of an e-mail from Peggy Foran dated April 8, 2005 as well as the attachment to that e-mail entitled “Important News About BEXTRA,” bearing bates numbers BEX006346174-81.

50. Attached hereto as Exhibit 50 is a true and correct copy of excerpts from the September 2, 2010 deposition of Allen P. Waxman.

51. Attached hereto as Exhibit 51 is a true and correct copy of a presentation entitled “Healthcare Law Compliance at Pfizer” bearing bates numbers PFE DERIV 00072982-73001.

52. Attached hereto as Exhibit 52 is a true and correct copy of excerpts from the Transcript of Change of Plea of Pharmacia & Upjohn Co., Inc. in United States of America v. Pharmacia & Upjohn Co., Inc., No. 09-10258-DPW, (District of Massachusetts), dated September 15, 2009.

53. Attached hereto as Exhibit 53 is a true and correct copy of the letter from Brien O’Connor to Michael Sullivan dated January 5, 2009, bearing bates numbers PFE DERIV 00067946-64.

54. Attached hereto as Exhibit 54 is a true and correct copy of the Corporate Integrity Agreement between the Office of Inspector General of the Department of Health and Human Services and Pfizer Inc dated August 31, 2009.

55. Attached hereto as Exhibit 55 is a true and correct copy of the Complaint in Congress of California Seniors v. Pharmacia Corp., et al., Case No. BC287484, (Los Angeles County Superior Court), filed on December 23, 2002.

56. Attached hereto as Exhibit 56 is a true and correct copy of the Reed Smith LLP publication titled “Unique California Laws Imperil Speech on ‘Off-Label’ Uses of Drugs,” dated May 14, 2004.

57. Attached hereto as Exhibit 57 is a true and correct copy of excerpts from the July 29, 2010 deposition of Dennis A. Ausiello.

58. Attached hereto as Exhibit 58 is a true and correct copy of the court docket in Congress of California Seniors v. Pharmacia Corp., et al., Case No. BC287484, (Los Angeles County Superior Court, December 23, 2002).

59. Attached hereto as Exhibit 59 is a true and correct copy of a presentation prepared by James P. Rouhandeh, Martine M. Beamon, and Ross Galin entitled “Overview of Lyrica Presentation to the United States Attorney’s Office,” dated September 11, 2007, and bearing bates numbers PFE DERIV 00065928-6045.

60. Attached hereto as Exhibit 60 is a true and correct copy of a letter from John S. Rah to Nicole Hall dated November 30, 2006, and bearing bates numbers PFE DERIV 00068016-18.

61. Attached hereto as Exhibit 61 is a true and correct copy of a letter from Robert B. Clark to Thomas Abrams dated November 30, 2006, as well as the attachment to that letter, bearing bates numbers PFE DERIV 00068019-21.

62. Attached hereto as Exhibit 62 is a true and correct copy of a letter from J.F. Friedman entitled “Proposed LYRICA Selling Phrases” bearing bates number PFE DERIV 00071900.

63. Attached hereto as Exhibit 63 is a true and correct copy of a memorandum from Douglas Lankler to the Audit Committee dated June 15, 2007, bearing bates numbers PFE DERIV 00003786-90.

64. Attached hereto as Exhibit 64 is a true and correct copy of a memorandum from DLA Piper US LLP to Pfizer Corporate Compliance dated June 12, 2007, bearing bates numbers PFE DERIV 00003754-64.

65. Attached hereto as Exhibit 65 is a true and correct copy of an e-mail from Clinton A. Lewis to Geodon sales representatives dated September 21, 2006, with the subject “Child/Adolescent Psychiatrist Exclusion Criteria,” and bearing bates numbers PG 267425-26.

66. Attached hereto as Exhibit 66 is a true and correct copy of a presentation prepared by Ropes & Gray LLP entitled “Overview of Zyvox Promotional Practices” dated October 24, 2008.

67. Attached hereto as Exhibit 67 is a true and correct copy of a letter from Thomas W. Abrams to Henry A. McKinnell, Jr. dated July 20, 2005.

68. Attached hereto as Exhibit 68 is a true and correct copy of a letter from Robert B. Clark to Thomas W. Abrams dated August 3, 2005, and bearing bates numbers PFE DERIV 00040339-40341.

69. Attached hereto as Exhibit 69 is a true and correct copy of a memorandum from Douglas Lankler to the Audit Committee dated September 10, 2008, and bearing bates numbers PFE DERIV A 00003652-44.

70. Attached hereto as Exhibit 70 is a true and correct copy of excerpts from the September 3, 2010 deposition of Ian C. Read.

71. Attached hereto as Exhibit 71 is a true and correct copy of an e-mail from David Cogan to the Geodon Sales Force listserv dated May 10, 2007, and bearing bates numbers PG267468-69.

72. Attached hereto as Exhibit 72 is a true and correct copy of an e-mail from J.F. Friedman to the Pfizer U.S. field team dated April 26, 2007, and bearing bates numbers PG 267470-71.

73. Attached hereto as Exhibit 73 is a true and correct copy of a presentation entitled “ZYVOX Sales Messaging Initiative and Compliance Update” dated February 2008, bearing bates numbers PFE DERIV 00071915-41.

74. Attached hereto as Exhibit 74 is a true and correct copy of redacted minutes for the August 2, 2007 meeting of the Audit Committee, bearing bates numbers PFE DERIV A PFE DERIV A 00001352-54.

75. Attached hereto as Exhibit 75 is a true and correct copy of Pfizer Inc.’s “in-context” training materials entitled “Linezolid versus vancomycin: analysis of two double-blind studies of patients with methicillin-resistant

Staphylococcus aureus nosocomial pneumonia” dated February 2008, bearing bates number PFE DERIV 01045986.

76. Attached hereto as Exhibit 76 is a true and correct copy of Pfizer Inc’s “in-context” training materials entitled “Clinical Cure and Survival in Gram-Positive Ventilator-Associated Pneumonia: Retrospective Analysis of Two Double-Blind Studies Comparing Linezolid With Vancomycin” dated February 2008, bearing bates number PFE DERIV 01045985.

77. Attached hereto as Exhibit 77 is a true and correct copy of the Department of Health and Human Services and the Department of Justice Health Care Fraud and Abuse Control Program’s Annual Report for FY 2008 dated September 2009.

78. Attached hereto as Exhibit 78 is a true and correct copy of the U.S. Department of Health and Human Services Office of Inspector General Corporate Integrity Agreements Document List, retrieved on October 21, 2010 from http://oig.hhs.gov/fraud/cia/cia_list.asp.

79. Attached hereto as Exhibit 79 is a true and correct copy of excerpts from the U.S. Department of Health and Human Services Office of Inspector General Semiannual Report to the Congress dated April-September 2003.

80. Attached hereto as Exhibit 80 is a true and correct copy of excerpts from the U.S. Department of Health and Human Services Office of Inspector General Semiannual Report to Congress dated October 1, 2007-March 31, 2008.

81. Attached hereto as Exhibit 81 is a true and correct copy of the Department of Health and Human Services and the Department of Justice Health

Care Fraud and Abuse Control Program's Annual Report for FY 2005 dated August 2006.

82. Attached hereto as Exhibit 82 is a true and correct copy of the Department of Health and Human Services and the Department of Justice Health Care Fraud and Abuse Control Program's Annual Report For FY 2007 dated November 2008.

83. Attached hereto as Exhibit 83 is a true and correct copy of excerpts from the U.S. Department of Health and Human Services Office of Inspector General Fiscal Year 2009 Medicaid Integrity Report dated March 2010.

84. Attached hereto as Exhibit 84 is a true and correct copy of "A Timeline of Big Pharma Settlements" retrieved from <http://quitamteam.com/news/external-news-sources/684-a-timeline-of-big-pharma-settlements> on October 21, 2010.

85. Attached hereto as Exhibit 85 is a true and correct copy of a professional biography of Joseph M. Feczko retrieved from the Foundation for the National Institutes of Health website on October 21, 2010.

86. Attached hereto as Exhibit 86 is a true and correct copy of a Corporate Compliance Update to the Audit Committee dated September 22, 2005, bearing bates numbers PFE DERIV A 00003359-3397.

87. Attached hereto as Exhibit 87 is a true and correct copy of the Annual Corporate Compliance Review memorandum from Douglas Lankler to the Audit Committee dated September 20, 2006, bearing bates numbers PFE DERIV A 00004056-4066.

88. Attached hereto as Exhibit 88 is a true and correct copy of the Annual Corporate Compliance Review memorandum from Douglas Lankler to the Audit Committee dated September 18, 2007, bearing bates numbers PFE DERIV A 00003739-3751.

89. Attached hereto as Exhibit 89 is a true and correct copy of the 2008 Annual Corporate Compliance Review memorandum from Douglas Lankler to the Audit Committee dated September 10, 2008, bearing bates numbers PFE DERIV A 00003618-3635.

90. Attached hereto as Exhibit 90 is a true and correct copy of the 2009 Annual Corporate Compliance Review memorandum from Douglas Lankler to the Audit Committee dated September 9, 2009, bearing bates numbers PFE DERIV A 00004405-4420.

91. Attached hereto as Exhibit 91 is a true and correct copy of excerpts from the September 13, 2010 deposition of Hugh Donnelly.

92. Attached hereto as Exhibit 92 is a true and correct copy of excerpts from the July 2, 2010 deposition of Margaret M. Foran.

93. Attached hereto as Exhibit 93 is a true and correct copy of a memorandum from Douglas Lankler to the Board of Directors dated May 31, 2009, with subject “Appendix I to the Evolution of Pfizer’s Compliance Program Memorandum – January 2002 to January 2009” and bearing bates numbers PFE DERIV 00077265-88.

94. Attached hereto as Exhibit 94 is a true and correct copy of redacted minutes for the December 15, 2008 meeting of the Audit Committee, bearing

bates numbers PFE DERIV A 00001295-98.

95. Attached hereto as Exhibit 95 is a true and correct copy of redacted minutes for the December 17, 2007 meeting of the Audit Committee, bearing bates numbers PFE DERIV A 00001335-38.

96. Attached hereto as Exhibit 96 is a true and correct copy of redacted minutes for the June 27, 2007 meeting of the Audit Committee, bearing bates numbers PFE DERIV A 00001357-60.

97. Attached hereto as Exhibit 97 is a true and correct copy of redacted minutes for the December 18, 2006 meeting of the Audit Committee, bearing bates numbers PFE DERIV A 00001379-83.

98. Attached hereto as Exhibit 98 is a true and correct copy of redacted minutes for the September 27, 2006 meeting of the Audit Committee, bearing bates numbers PFE DERIV A 00001388-91.

99. Attached hereto as Exhibit 99 is a true and correct copy of redacted minutes for the December 12, 2005 meeting of the Audit Committee, bearing bates numbers PFE DERIV A 00001413-16.

100. Attached hereto as Exhibit 100 is a true and correct copy of redacted minutes for the September 22, 2005 meeting of the Audit Committee, bearing bates numbers PFE DERIV A 00001425-29.

101. Attached hereto as Exhibit 101 is a true and correct copy of redacted minutes for the May 26, 2005 meeting of the Audit Committee, bearing bates numbers PFE DERIV A 00001439-45.

102. Attached hereto as Exhibit 102 is a true and correct copy of

redacted minutes for the December 13, 2004 meeting of the Audit Committee, bearing bates numbers PFE DERIV A 00001461-66.

103. Attached hereto as Exhibit 103 is a true and correct copy of redacted minutes for the May 27, 2004 meeting of the Audit Committee, bearing bates numbers PFE DERIV A 00001479-82.

104. Attached hereto as Exhibit 104 is a true and correct copy of redacted minutes from the September 25, 2008 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000065-72.

105. Attached hereto as Exhibit 105 is a true and correct copy of redacted minutes from the June 25 and 26, 2008 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000074-81.

106. Attached hereto as Exhibit 106 is a true and correct copy of redacted minutes from the May 26, 2005 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000173-81.

107. Attached hereto as Exhibit 107 is a true and correct copy of redacted minutes from the April 28, 2005 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000183-92 .

108. Attached hereto as Exhibit 108 is a true and correct copy of redacted minutes from the May 27, 2004 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000340-49.

109. Attached hereto as Exhibit 109 is a true and correct copy of redacted minutes from the December 18, 2006 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000380-400.

110. Attached hereto as Exhibit 110 is a true and correct copy of redacted minutes from the June 22 and 23, 2006 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000415-30.

111. Attached hereto as Exhibit 111 is a true and correct copy of redacted minutes from the June 27-28, 2007 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000507-19.

112. Attached hereto as Exhibit 112 is a true and correct copy of redacted minutes from the September 24, 2009 meeting of the Board of Directors, bearing bates numbers PFE DERIV A 00000922-52.

113. Attached hereto as Exhibit 113 is a true and correct copy of a Compliance Update and accompanying memorandum and attachments from Amy Schulman and Douglas Lankler to the Audit Committee dated February 25, 2009, bearing bates numbers PFE DERIV 00004230-39.

114. Attached hereto as Exhibit 114 is a true and correct copy of redacted minutes of the March 22, 2007 Regular Meeting of the Board of Directors of Pfizer Inc bearing bates numbers PFE DERIV 00000534-553.

115. Attached hereto as Exhibit 115 is a true and correct copy of excerpts from Pfizer Inc's 2006 Proxy Statement issued on March 16, 2006.

116. Attached hereto as Exhibit 116 is a true and correct copy of excerpts from Pfizer Inc's 2007 Proxy Statement issued on March 15, 2007.

117. Attached hereto as Exhibit 117 is a true and correct copy of excerpts from Pfizer Inc's 2008 Proxy Statement issued on March 14, 2008.

118. Attached hereto as Exhibit 118 is a true and correct copy of excerpts from Pfizer Inc's 2009 Proxy Statement issued on March 12, 2009.

119. Attached hereto as Exhibit 119 is a true and correct copy of excerpts from the July 15, 2010 deposition of Suzanne N. Johnson.

120. Attached hereto as Exhibit 120 is a true and correct copy of excerpts from the October 8, 2010 deposition of John Chapman.

121. Attached hereto as Exhibit 121 is a true and correct copy of a Pfizer November 2003 workshop bearing bates numbers PFE DERIV 00073442-43.

122. Attached hereto as Exhibit 122 is a true and correct copy of an unsigned form letter from Pfizer Inc regarding approved indications of Lyrica, bearing bates number LYRC000044828.

123. Attached hereto as Exhibit 123 is a true and correct copy of a transcription of a video recording of the September 13, 2005 Lyrica Launch Presentation by Beth Levine. A native version of the recording is available if the Court would like to receive it.

124. Attached hereto as Exhibit 124 is a true and correct copy of excerpts from the July 22, 2010 deposition of W. Don Cornwell.

125. Attached hereto as Exhibit 125 is a true and correct copy of excerpts from the September 20, 2010 deposition of Brien O'Connor.

126. Attached hereto as Exhibit 126 is a true and correct copy of the redacted April 2007 Pfizer Legal Division Board Report, bearing bates numbers PFE DERIV A 00010109-12.

127. Attached hereto as Exhibit 127 is a true and correct copy of the redacted December 2, 2005 legal division report to the board of directors, bearing bates numbers PFE DERIV A 00008791-97.

128. Attached hereto as Exhibit 128 is a true and correct copy of the redacted April 2, 2005 legal division report to the board of directors, bearing bates numbers PFE DERIV A 00008317-30.

129. Attached hereto as Exhibit 129 is a true and correct copy of the redacted June 20, 2003 legal division report to the board of directors, bearing bates numbers PFE DERIV A 00006617-27.

130. Attached hereto as Exhibit 130 is a true and correct copy of a March 26, 2008 Compliance Update and accompanying memorandum from Douglas Lankler to the Audit Committee, bearing bates numbers PFE DERIV A 00003526-31.

Executed: October 22, 2010
New York, New York

DAVIS POLK & WARDWELL LLP

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